



Attorneys at Law

Daniel R. Levy
t: 973.639.8292
DLevy@ebglaw.com

July 7, 2023

Via ECF

Hon. Esther Salas, U.S.D.J.
Martin Luther King Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

**Re: Hair Zone, Inc. v. Bae et al.,
Case No. 2:23-cv-03598-ES-AME**

Dear Judge Salas:

This firm represents plaintiff Hair Zone, Inc. (“Hair Zone”) in the above-referenced action. We write in response to defendant Dae Do Inc.’s (“DDI”) letter requesting an adjournment of the hearing date presently scheduled for July 11, 2023 at 1:00p.m. Hair Zone objects to an extension of the hearing.

DDI was notified of this action on Wednesday, July 5, 2023, the same day it was commenced. This morning, counsel for DDI contacted me via telephone to introduce himself as DDI’s counsel and requested that he be provided with the documents Hair Zone filed under seal. Hair Zone agreed and shortly thereafter provided the documents filed under seal to DDI’s counsel on the condition that they be treated on an attorneys’ eyes only basis. As such, there is no prejudice to DDI or its counsel with a hearing four days from now.

By way of background, Hair Zone commenced this action on the afternoon of Wednesday, July 5, 2023, with the filing of the Complaint and an Order to Show Cause with supporting papers seeking a Temporary Restraining Order (TRO) and Preliminary Injunction, alleging misappropriation of trade secrets, among other claims. Shortly after filing the Complaint and motion, I e-mailed DDI’s CEO, Moonki Kim, at his business e-mail account with copies of the publicly-filed papers.

DDI has had access to most of the papers in this case since the day Hair Zone filed this action. The documents filed under seal were provided to DDI’s counsel in less than an hour after DDI’s counsel confirmed that such documents would be treated as attorneys’ eyes only.

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Given the allegations against defendants and the emergent relief requested in the TRO, we respectfully request that the Court hold the hearing on July 11, 2023 at 1:00p.m.

Respectfully Submitted,

s/ DANIEL R. LEVY

Daniel R. Levy

JB/gs

cc: David Mordkoff, Esq.
All Counsel of Record, via ECF